

EXHIBIT A



Re: Uber JCCP / MDL Production Dates for discussion

From Roopal Luhana <Luhana@chaffinluhana.com>

Date Mon 9/30/2024 2:23 PM

To Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Cc Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabraams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenbergs.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Michael, we generally are ok with the schedule but need Uber to agree to the terms below. Also, we see there are custodians with agreed to deposition dates, e.g., Baker and Freivogel have deposition dates of Nov. 19 and Nov. 14-15, respectively but your chart reflects custodial files to be produced on 10/21 and privilege logs on 11/15. We need to expedite those productions.

- 1) Privilege logs for Custodians 21-37 be produced Dec. 9 so we can work to resolve disputes before year end;
- 2) If depositions are noticed then we need expedited production of custodial files and privilege logs; and
- 3) Uber must address validation issues, address hyperlink issues immediately, ensure priv logs comply with ESI/Priv Orders and produce complete personnel files.

Let us know your thoughts.

Best,
Roopal

Roopal Luhana | Partner
E: Luhana@chaffinluhana.com
P: (347) 269-4461

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ChaffinLuhana.com
 ChaffinLuhanaFoundation.org



Mailing Address:

Chaffin Luhana LLP 600 Third Ave., 12th Flr. New York, NY 10016

A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.

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From: Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Sent: Monday, September 30, 2024 2:08 PM
To: Roopal Luhana <Luhana@chaffinluhana.com>
Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabraams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenbergs.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>
Subject: RE: Uber JCCP / MDL Production Dates for discussion

Roopal and team, we wanted to check back with you on this proposal. We are available to hop on a short call if it is easier to discuss. Thank you, Michael

From: Shortnacy, Michael (SHB)
Sent: Friday, September 27, 2024 8:40 PM
To: Roopal Luhana <Luhana@chaffinluhana.com>
Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabraams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenbergs.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>
Subject: RE: Uber JCCP / MDL Production Dates for discussion

Roopal, Beth, Brian & team,

Following our further meet and confer this afternoon, we have a further proposal on the remaining custodial production dates. The dates are tracked in a new column with a yellow header. Note that the deposition dates listed are the placeholder dates originally set, and no longer current. So you can disregard those dates.

Appreciate your cooperation on this.

Michael

Michael B. Shortnacy

Partner

Shook, Hardy & Bacon L.L.P.
2121 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
T: 424-324-3494 | mshortnacy@shb.com

*Please note new mailing address



From: Roopal Luhana <Luhana@chaffinluhana.com>
Sent: Monday, September 23, 2024 4:46 PM
To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenbergs.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>
Subject: Re: Uber JCCP / MDL Production Dates for discussion

EXTERNAL

Great, thanks. Copying Brian.

On Sep 23, 2024, at 7:16 PM, Shortnacy, Michael (SHB) <mshortnacy@shb.com> wrote:

+ Randy. Thanks, Roopal. Tomorrow at 4 pm ET works for us. I will send an invitation to this group. Did you also invite Brian A.? Michael

From: Roopal Luhana <Luhana@chaffinluhana.com>
Sent: Monday, September 23, 2024 7:09 AM
To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Beth Wilkins <Wilkins@chaffinluhana.com>
Cc: Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenbergs.com>; Roopal Luhana <Luhana@chaffinluhana.com>
Subject: Re: Uber JCCP / MDL Production Dates for discussion

EXTERNAL

Thank you for the e-mail Michael. We'd had a chance to discuss and would like to schedule a call. Let us know if tomorrow between 2:30-4:30pm ET works for you to chat. Thanks.

Best,
 Roopal

Roopal Luhana | Partner
 E: Luhana@chaffinluhana.com
 P: (347) 269-4461

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From: Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Sent: Thursday, September 19, 2024 11:57 AM
To: Roopal Luhana <Luhana@chaffinluhana.com>; Beth Wilkins <Wilkins@chaffinluhana.com>
Cc: Oot, Patrick L. (SHB) <OOT@shb.com>
Subject: Uber JCCP / MDL Production Dates for discussion

Roopal & Beth,

Thank you for your time today.

As we discussed, attached are Uber's proposed dates that would vary slightly from the Court's most recent scheduling Order and allow for alignment between JCCP and MDL. We believe these dates are going to be difficult to hit, but we are prepared to hit them and think they are possible. The dates set by the Court, however, are not possible, and we would like to work with your side to avoid motion practice to modify the Order (with declarations and evidentiary support from Uber on why October 1 is not feasible, or possible, etc.) Happy to get back on the phone to discuss further, after your side has had a chance to consider.

Michael

Michael B. Shortnacy
Partner
Shook, Hardy & Bacon L.L.P.
2121 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
T: 424-324-3494 | mshortnacy@shb.com

*Please note new mailing address



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